

LAW OFFICE OF

JOHN F. CARMAN

666 OLD COUNTRY ROAD

SUITE 501

GARDEN CITY, NEW YORK 11530-2004

JAMES E. NEUMAN

KAREN KERR

Of Counsel

(516) 683-3600

TELECOPIER

(516) 683-8410

February 26, 2011

VIA ECF

Honorable Joanna Seybert
United States District Judge
Eastern District of New York
1034 Federal Plaza
Central Islip, NY 11722

**Re: United States v. Dominick Curatola, et al.
Criminal Docket No. 10-991-(S-1) (JS)**

Dear Judge Seybert:

I represent Brian Sullivan in connection with the above-referenced indictment which is pending before Your Honor. This letter is submitted in opposition to the government's February 21, 2011 application requesting, among other things, that the Court designate this case "complex" for purposes of the Speedy Trial Act.

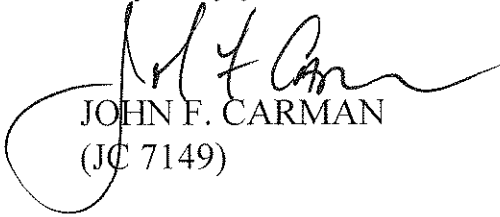
I am scheduled to appear with another client for sentencing before the Honorable I. Leo Glasser March 4, 2011, the date of the next conference. While I will request that one of colleagues to stand in for me, I would ask that the Court accept this letter as an expression of Mr. Sullivan's objection to the government's application and an assertion of his desire for a speedy trial pursuant to *Barker v. Wingo*, 407 U.S. 514, 530 (1972).

Mr. Sullivan has been advised of his right to pre-trial discovery, as well as, his right to file any appropriate motions. Although I have only known him for a brief period, he seems intelligent and conversant with the issues that relate to his case. In order to accommodate Mr. Sullivan's desire to reach an expeditious resolution, I respectfully request that the Court sever Mr. Sullivan *sua sponte* and

set the matter down for trial. In the alternative, if my client so directs, I will file an motion to sever on his behalf.

Thank you for your consideration.

Very truly yours,

A handwritten signature in black ink, appearing to read "John F. Carman", is written over the typed name. The signature is fluid and cursive, with a large loop at the end.

JOHN F. CARMAN
(JC 7149)

cc: AUSA Carrie Capwell
Brian Sullivan

JFC/nfs